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Attorney for Movant for Intervention as Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

CHILKAT INDIAN VILLAGE OF KLUKWAN; SOUTHEAST ALASKA CONSERVATION COUNCIL; LYNN CANAL CONSERVATION; and RIVERS WITHOUT BORDERS, a project of TIDES CENTER,

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT; BRIAN STEED in his official capacity as Acting Director of the Bureau of Land Management; KAREN MOURITSEN, in her official capacity as Acting Alaska State Director of the Bureau of Land Management; and DENNIS TETZEL, in his official capacity as Field Manager of the Bureau of Land Management Glenallen Field Office,

Defendants.

Case No. 3:17-cv-00253-TMB

MOVANT DEFENDANT INTERVENORS CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, Movants makes the following disclosure regarding their corporate status: Movant Constantine North, Inc. ("Constantine"), is a wholly owned subsidiary of Constantine Metal Resources Ltd. Constantine North Inc. has a Joint Venture with Dowa Metals & Mining Alaska Ltd. ("Dowa") in which Constantine holds a 51%

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interest and Dowa holds a 49% interest with Constantine as Operator. Constantine Mining LLC was formed after formation of the Joint Venture in order to hold the assets and to operate and conduct the Joint Venture. The interest of Constantine and Dowa in Constantine Mining LLC is proportional to their respective Joint Venture interest, which currently equals 51% and 49% respectively.

No other Movant has a parent corporation and no other publicly held corporation has any form of ownership interest in the Movants. Specifically, Alyu Mining Co., Inc and Haines

Mining & Exploration are privately held corporations.

RESPECTFULLY SUBMITTED January 2018.

James F. Clark

Alaska Bar No: 6907025 Attorney for Movants jfclarkiii@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on January 2018 a copy of the foregoing:

MOVANT DEFENDANT INTERNENORS' CORPORATE DISCLOSURE STATEMENT

was electronically served on the following parties in accordance with ECF's electronic filing protocols:

Eric P. Jorgensen eric@eartjustiuce.org_

Kenta Tsuda ktsuda@earthjustice.org

Peter Heisler pheisler@earthjustice.org

I hereby certify that on January 2018 a copy of the foregoing:

MOVANT DEFENDANT INTERVENORS' CORPORATE DISCLOSURE STATEMENT

was served by U.S. Mail on the following:

Brian Steed, Acting Director Bureau of Land Management 1849 C Street NW, Room 5665 Washington, DC 20240

Karen Mouritsen, Acting State Director Bureau of Land Management 222 W 7th Avenue #13 Anchorage, AK 99513

Dennis Teitzel, Field Manager Bureau of Land Management Glennallen Field Office P.O. Box 147 Mile Post 186.5 Glenn Highway Glennallen, AK 99588

Jeff Sessions, Attorney General U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530-0001

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Civil Process Clerk U.S. Attorney, District of Alaska 222 West 7th Avenue, Room 253 #9 Anchorage, AK 99513

James F. Clark